

M60050_003671 MCAS EL TORO SSIC NO. 5090.3.B



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

December 18, 2003

Mr. F. Andrew Piszkin BRAC Environmental Coordinator Base Realignment and Closure Marine Corps Air Station, El Toro 7040 Trabuco Road Irvine, CA 92618

RE: Comments on Draft Final Finding of Suitability to Transfer (FOST), Former Marine Corps

Air Station, El Toro, CA, November, 2003

Dear Mr. Piszkin:

EPA has reviewed the draft final Finding of Suitability to Transfer (FOST) for MCAS El Toro. The attached comments represent our preliminary comments on this document. As we have indicated via written and verbal correspondence, due to the nature of the transfer of property at El Toro, the Finding of Suitability to Transfer and Finding of Suitability to Lease must be reviewed and finalized in tandem. Many outstanding issues remain on the FOSL which affect the FOST. Therefore, EPA is unable to provide its final review until issues raised by EPA and the State of California have been resolved and both documents are close to their final form.

If you have questions, please call me at (415) 972-3012.

Sincerely,

Nicole Moutoux
Project Manager

Federal Facilities Cleanup Branch

cc: Kyle Olewnik, SWDIV
John Broderick, RWQCB
Rafat Abbasi, DTSC
Content Arnold, SWDIV
Thelma Estrada, EPA
Bob Woodings, RAB Community Co-Chair
Marcia Rudolph, RAB Subcommittee Co-chair
Daniel Jung, City of Irvine
Dean Gould, Base Closure Manager, El Toro and Tustin



Preliminary Comments on Draft Final FOST Former MCAS El Toro dated November, 2003

GENERAL COMMENTS:

- 1. All comments on the FOSL must be resolved final to finalization of the FOST. These documents are so interconnected that issues affecting one affect the other as well. In addition, comments made by agencies on the draft final FOSL and FOST should be addressed and reviewed by the agencies prior to inclusion into the final documents.
- 2. In the response to EPA's comments on the draft FOST, the Navy indicated that they would discuss groundwater contamination in Chapter 1. Chapter 1 does not contain such a discussion. Such a discussion should be provided and would be appropriately placed in Chapter 5 where other contaminated areas are discussed. The summary should reference Attachment 6 which shows contaminated groundwater plumes at the base.

SPECIFIC COMMENTS:

- 1. Figure 4, Attachment 6 and Section 5.3: A discussion of the plume at site 2 should be included here or within the groundwater summary section as requested in general comment number 2. IRP site 2 should be shown on figure 4 and the plume and associated buffer zone should be shown on attachment 6.
- 2. Table 4: TAA 636.is designated as category 6 which is not transferable. Please reconcile.